

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION

<p><b>In re:</b></p> <p><b>James Wooden</b> <b>Debtor</b></p> <p><b>Vernice Wooden</b> <b>Joint Debtor</b></p> <p><b>NewRez LLC d/b/a Shellpoint Mortgage Servicing</b></p> <p><b>Movant</b></p> <p><b>v.</b></p> <p><b>James Wooden</b></p> <p><b>Vernice Wooden</b></p> <p><b>Debtor/Respondent</b></p> <p><b>KENNETH E. WEST, Esquire</b></p> <p><b>Trustee/Respondent</b></p>	<p><b>Bankruptcy No. 21-10885-amc</b></p> <p><b>Chapter 13</b></p> <p><b>Hearing Date: November 12, 2024</b> <b>Hearing Time: 11:00 a.m.</b> <b>Location: 900 Market Street, Suite 400</b> <b>Philadelphia, PA 19107</b> <b>Courtroom Number #4</b></p>
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**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

NewRez LLC d/b/a Shellpoint Mortgage Servicing has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1); for costs and disbursements of this action, and for such other and further relief as to the Court may deem just and proper.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

**1. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the motion, then on or before November 1, 2024, you or your attorney must file a response to the Motion. (see *Instructions on next page*).**

(a) File an answer explaining your position at: 900 Market Street, Suite 400  
Philadelphia, PA 19107.

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough that it will be received on or before the dates stated above; and

(b) Mail a copy to the movant's attorney:

Robert Shearer, Esquire  
13010 Morris Rd., Suite 450  
Alpharetta, GA 30004  
Telephone: 470-321-7112  
Email: [rshearer@raslg.com](mailto:rshearer@raslg.com)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. **A hearing on the Motion** is scheduled to be held before **Judge Ashely M. Chan** on **November 12, 2024**, at **11:00 a.m.** in **Courtroom Number #4, United States Bankruptcy Court, 900 Market Street, Suite 400 Philadelphia, PA 19107**. Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**.
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's Office in Philadelphia at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

Dated: 10/17/2024

**Robertson, Anschutz, Schneid, Crane & Partners, PLLC**  
Attorney for Secured Creditor  
13010 Morris Rd., Suite 450  
Alpharetta, GA 30004  
Telephone: 470-321-7112  
By: /s/Robert Shearer  
Robert Shearer  
PA Bar Number 83745  
Email: [rshearer@raslg.com](mailto:rshearer@raslg.com)

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**CERTIFICATE OF SERVICE OF NOTICE OF MOTION**

I, the undersigned, certify under penalty of perjury that I am, and at all times hereinafter mentioned, was more than 18 years of age, and that on October 17, 2024, I served copies of the Notice of Motion upon the parties in interest in this proceeding, by first class U.S. Mail, postage prepaid or electronic mail, at the following addresses:

**James Wooden**  
7728 Delphi Pl  
Philadelphia, PA 19153

**Vernice Wooden**  
7728 Delphi Pl  
Philadelphia, PA 19153

**JEFFREY M. CARBINO**  
Leech Tishman Fuscaldo & Lampl  
1007 N Orange Street  
Suite 420  
Wilmington, DE 19801

**ERIK B. JENSEN**  
Jensen Bagnato, PC  
1500 Walnut St.  
Suite 1510  
Philadelphia, PA 19102

**KENNETH E. WEST**  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

**United States Trustee**  
Office of United States Trustee  
Robert N.C. Nix Federal Building  
900 Market Street  
Suite 320  
Philadelphia, PA 19107

Date: 10/17/2024

**Robertson, Anschutz, Schneid, Crane  
& Partners, PLLC**  
Attorney for Secured Creditor  
13010 Morris Rd., Suite 450  
Alpharetta, GA 30004  
Telephone: 470-321-7112  
By: /s/Robert Shearer  
Robert Shearer  
PA Bar Number 83745  
Email: [rshearer@raslg.com](mailto:rshearer@raslg.com)